

Your  
Seattle  
City Light

Randall W. Hardy, Superintendent  
Charles Royer, Mayor



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September 2, 1986

James Puckett and Shelley Stewart  
Greenpeace Northwest  
4649 Sunnyside Avenue North  
Seattle, WA 98104

Dear Mr. Puckett and Ms. Stewart:

Thank you for your letter of August 7. I am sorry that you are dissatisfied with our response to the EAC Resolution on PCB Disposal. I hope this letter will clarify City Light's position, respond to the questions you raised at the meeting, and address the concerns you outlined in your August 7 letter. Specifically, in response to your points:

- (1) City Light's main goal is environmental protection, rather than satisfaction of a particular organization, even one that has taken a leadership position on a particular environmental issue. I was remiss if I left you with that impression. We agree that the potential risk from dioxins and furans should be avoided if it reasonably can. We certainly agree that the state priorities on managing hazardous wastes (RCW 70.105.150) should be followed whenever possible.
- (2) We have rebid for on-site chemical decontamination, have selected a contractor, Sunohio, and are now negotiating a contract. Sunohio holds necessary EPA permit for a mobile sodium dispersion process and has proposed a schedule which meets the April 1, 1987 EPA deadline. City Light does have a preference for decontamination. Our concern in this instance was the questionable availability of an off-site contractor to decontaminate the large volume of heavy oil by the EPA deadline.
- (3) By now you have received your invitation to participate in our Toxic Advisory Group. We look forward to

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discussing the full range of toxic topics with the entire committee.

- (4) It is our understanding that RCW 70.105.150 creates priorities (as opposed to absolute requirements) for waste management and our long range goal is to move as close as possible, and as quickly as possible to the priorities. It is also our understanding that the state has a 1 ppm action level for PCB for scrapped or surplussed transformer mineral oil, which our procedures meet.

We can give a few examples of where City Light has exceeded Federal or State requirements:

- o Our drained transformers 50-500 ppm are treated as though they were over 500 ppm, though this is not required.
  - o 18 hour rinse is required for transformers 5-50 ppm even if they are scrapped outside of Washington State.
  - o Our action level for PCB contaminated oil cleanup in surplussed substations is 10 ppm, rather than the 50 ppm of TSCA.
  - o The utility has a goal of reducing PCB levels to no more than 50 ppm by 1990 even though this is not required by TSCA.
- (5) Attached is our purchasing paperwork on our transformer retrofilling process. Westinghouse (now Eastern Electric) actually uses a subcontractor to process the extracted oil. Oil is transported to the PPM, Inc. in Utah for decontamination. The concentration requirements are actually a bit complicated. The oil that is removed must be decontaminated to less than 2 ppm. New, clean, oil is pumped into the transformer. In many cases, utility experience shows that the PCB level in the transformer actually rises over a period of weeks. This is thought to be due to PCBs "bleeding" from the core's

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paper windings. We have set a requirement that if a transformer drifts above 50 ppm within 90 days the vendor must change out the oil again.

- (6) We are developing specifications for a comprehensive re-bidding of all our electrical equipment related PCB disposal. The oil portion will include a preference for decontamination.
- (7) I obviously failed to make clear that it is City Light's preference to treat rather than dispose. However, the Utility is not yet able to commit to a policy of decontamination in all instances. While the technology is available for transformer oil, the industry is still perfecting methods for other substances.

As promised, I have attached some descriptions of the research we are planning for the area of PCB disposal.

We look forward to your joining the Toxic Advisory Group. If you have any further concerns or questions in the meantime, please call me at 625-3691 or Tim Croll at 625-3105. Thank you.

Sincerely,

**Original Signed By**  
**LYNN DAVISON, DIRECTOR**

Lynn Davison, Director  
Environmental Affairs Division

TC:jf

Enclosure

w/o enclosures \*  
cc: Hardy \*  
Jerochim  
Gerstle  
Croll  
Luboff  
Kakida  
Benson  
Minteer  
EAD  
File

*Reference  
\* complete file to Hardy*